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Counsel for Pennsylvania Public School Employees' Retirement System

## UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

	<b>2</b>	
In re:	:	<b>Chapter 11</b>

:

LEHMAN BROTHERS HOLDINGS INC., et al : Case Nos. 08-13555 (JMP)

(Jointly Administered)

Debtor. :

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SUPPLEMENT TO REPLY OF PENNSYLVANIA PUBLIC SCHOOL EMPLOYEES' RETIREMENT SYSTEM TO DEBTOR'S OBJECTION TO MOTION FOR ENTRY OF AN ORDER THAT ITS TIMELY FILED GUARANTEE QUESTIONNAIRE BE CONSIDERED A TIMELY FILED PROOF OF CLAIM, OR, IN THE ALTERNATIVE, TO PERMIT A LATE CLAIM FILING PURSUANT TO FEDERAL RULE OF BANKRUPTCY PROCEDURE 9006(b)(1)

- 1. On January 7, 2010, Pennsylvania Public School Employees' Retirement System ("PSERS") filed a motion for authorization that its timely filed Guarantee Questionnaire be considered a timely filed proof of claim or, in the alternative, to permit a late claim filing pursuant to Federal Rule of Bankruptcy Procedure 9006(b)(1), dated January 7, 2010 (the "Motion").
- 2. On February 3, 2010, the Debtors objected to the relief PSERS seeks in its Motion.

- 3. On March 17, 2010, the Court held a hearing in relation to the Motion (the "Hearing").
- 4. At the Hearing, counsel to the Debtors disputed LBHI's obligation in regard to the Euro Medium-Term Note.
- 5. As asserted by PSERS, LBHI has unconditionally guaranteed all of the Euro Medium-Term Notes to be issued by Lehman Brothers Treasury Co. B.V. and Lehman Brothers Bankhaus AG. A true and correct copy of LBHI's guarantee is attached hereto as <a href="Exhibit A">Exhibit A</a>.

## **DUANE MORRIS LLP**

Dated: April 6, 2010 By: /s/ Lawrence J. Kotler

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